

REMARKS

Claims 1-2, 4-11, and 13-18 are pending in the present application. Claim 17 and 18 are amended. No new matter is added by this amendment. Claims 4-11 have been withdrawn in response to a restriction requirement. In view of the amendments and the following remarks, Applicants respectfully request reconsideration and allowance of the present application.

102(e) Rejection

Claims 1, 13-16, and 18 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 5,952,694 to Miyawaki et al. (hereinafter Miyawaki). Applicants respectfully traverse.

The Office Action argues that the feature of “performing a processing step on which the upper surface of said wiring is exposed using a liquid applied to said semiconductor substrate and a light source radiating light onto said semiconductor substrate” does not require that the upper wiring be exposed *by exposure* to liquid and exposure to light. The Examiner’s reading of the claim robs the claim language of all meaning. In particular, the specification discusses this processing step in detail on page 12, line 5, to page 13, line 4. Part of this portion of the specification states:

The cleaning system is composed of a processing unit 31, ***which cleans the semiconductor substrate using*** pure water for cleaning (or an electrically conductive cleaning chemical), ***and a light source 33***, which is arranged to the outside of windows 32 of processing unit 31 and radiates light having a wavelength of 500 nm to less than 1 μm onto processing unit 31.

(Specification; page 12, lines 7-11; emphasis added). As is apparent from this section of the specification, as well as from the plain meaning of the claim language, the processing step *exposes the wiring using a liquid and a light source*. In contrast, the Office Action reads the claim feature as if the second part of the clause is a distinct processing step, and essentially reads the word “using” out of the claim completely. The section cited of Miyawaki cited as disclosing this feature of claim 1 merely states that “[t]he edges of the first selective oxidation regions 11 serving as the alignment marks are detected by an He-Ne laser upon radiation of a laser beam incident on the upper surface.” (Miyawaki; col. 21, lines 31-34). Therefore, Miyawaki apparently uses the light source in order to detect alignment marks. According to the dictionary, using means “to put into service or apply for a purpose”. (Dictionary.com, citing The American Heritage Dictionary of the English Language, Fourth Edition). Therefore, in the context of claim 1, it is apparent that the application of liquid and exposing to light *are for the purpose of* exposing the wiring. Claim 1 recites a processing step that exposes wiring using liquid and light. It is respectfully submitted that Miyawaki does not disclose or suggest exposing wiring using liquid and light, and therefore the reference does not anticipate claim 1.

Claims 4-11 and 13-16 depend from claim 1 and are therefore allowable for at least the same reasons as claim 1 is allowable.

Regarding claim 18, Applicants respectfully submit that the amendment to claim 18 does not raise new issues, clarifies the claim for purposes of appeal, and/or places the claim in condition for allowance. Accordingly, Applicants respectfully request that the amendment to claim 18 be entered. Amended claim 18 recites that the wiring may connect the P region or the N region and recites exposing the upper surface of the wiring

using a liquid applied to the semiconductor substrate and a light source radiating light onto the semiconductor substrate. It is respectfully submitted that this feature is not disclosed or suggested in Miyawaki, and therefore it is respectfully submitted that claim 18 is allowable.

103(a) Rejection

Claim 2 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Miyawaki in view of United States Patent No. 6,169,652 to Klebanoff (hereinafter Klebanoff). Applicants respectfully traverse.

The addition of Klebanoff fails to cure the critical deficiency discussed above in regard to Miyawaki as applied against claim 1, and therefore claim 2 is allowable for at least the same reasons as claim 1 is allowable.

Allowed Claim

The Office Action acknowledges that claim 17 is directed to allowable subject matter. Claim 17 has been amended into independent form and therefore it is respectfully submitted that claim 17 is in condition for allowance.

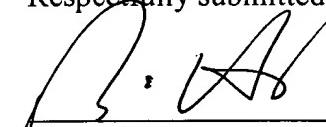
Conclusion

In view of the above remarks, it is believed that claims 1, 2, and 13-18 are in condition for allowance, which action is respectfully solicited. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the

Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper, not fully covered by an enclosed check, may be charged on Deposit Account 50-1290.

Respectfully submitted,



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